

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PAT CASON-MERENDA and
JEFFREY A. SUHRE on behalf of
themselves and all others similarly situated,

Plaintiffs,

CASE NO.: 2:06-cv-15601

-v-

Hon. Gerald E. Rosen
Magistrate: Donald A. Scheer

DETROIT MEDICAL CENTER,
HENRY FORD HEALTH SYSTEM,
MC LAREN HEALTH CARE CORP, d/b/a
MOUNT CLEMENS REGIONAL MEDICAL
CENTER, f/k/a MOUNT CLEMENS GENERAL
OAKWOOD HEALTHCARE INC., BON
SECOURS COTTAGE HEALTH SERVICES,
WILLIAM BEAUMONT HOSPITAL, and
TRINITY HEALTH CORP.,

Defendants.

**DETROIT MEDICAL CENTER'S MOTION FOR LEAVE
TO FILE DMC'S REPLY BRIEF IN SUPPORT OF ITS MOTION SEEKING
DEFERRAL OF PLAINTIFFS' MOTIONS FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENTS OR, AT A MINIMUM, DEFERRAL OF CLASS NOTICE
UNDER SEAL PURSUANT TO PROTECTIVE ORDER**

Pursuant to U.S. District Court for the Eastern District of Michigan Local Rule 5.3(b)(2) and Section 3 of the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information, [D.E. 61] ("Protective Order"), Detroit Medical Center (DMC) respectfully requests this Court to seal its reply brief in support of Detroit Medical Center's motion seeking deferral of plaintiffs' motions for preliminary approval of class settlements or, at a minimum, deferral of class notice ("Reply Brief") and the accompanying exhibits to the Brief.

The Reply Brief contains confidential information and references exhibits bearing confidentiality designations that are subject to the Protective Order. Section 3 of the Protective Order requires parties to file confidential information under seal. (See D.E. 61 at 7-8).

Accordingly, DMC respectfully requests that this Court enter an order sealing the Reply Brief and accompanying exhibits. A proposed order is submitted herewith.

DETROIT MEDICAL CENTER,
LEGAL AFFAIRS

By: /s/ Charles N. Raimi
Charles N. Raimi (P29746)
Attorney for defendant, Detroit Medical Center
4707 St. Antoine, Suite W514
Detroit, MI 48201
E-Mail: craimi@dmc.org
(313) 966-2226

Dated: December 4, 2009

CERTIFICATE OF SERVICE

I, Charles N. Raimi, an attorney of record in this case, hereby certify that I have caused a copy of the foregoing to be served electronically on the following counsel of record this 4th day of December, 2009.

Stephen F. Wasinger STEPHEN F. WASINGER PLC 26862 Woodward Avenue, Suite 100 Royal Oak, MI 48067-0958 E-mail: sfw@sfwlaw.com Counsel for plaintiffs	Mark A. Griffin Keller Rohrback 1201 Third Avenue, Suite 3200 Seattle, WA 98101 E-mail: mgriffin@kellerrohrback.com , Counsel for plaintiffs
Charles P. Tompkins COHEN, MILSTEIN, HAUSFELD & TOLL 1100 New York Avenue NW West Tower, Suite 500 Washington, DC 20005 E-mail: ctompkins@cmht.com Counsel for plaintiffs	David P. Dean JAMES & HOFFMAN 1101 17 th Street, N.W., Suite 510 Washington, DC 20036 E-mail: dpdean@jamhoff.com Counsel for plaintiffs
David Marx, Jr. McDERMOTT, WILL & EMERY 227 W. Monroe Street Chicago, IL 60606 E-mail: dm Marx@mwe.com , Counsel for Henry Ford Health System	David A. Ettinger HONIGMAN MILLER SCHWARTZ AND COHN LLP 660 Woodward Avenue, Suite 2290 Detroit, MI 48226-3506 E-mail: dettinger@honigman.com , Counsel for McLaren Health Care Corp.
Howard B. Iwrey DYKEMA GOSSETT 39577 Woodward Avenue, Suite 300 Bloomfield Hills, MI 48304-2820 E-mail: hiwrey@dykema.com Counsel for Oakwood Healthcare Inc.	Margo Weinstein SONNENSCHN NATH & ROSENTHAL 7800 Sears Tower Chicago, IL 60606-6404 mweinstein@sonnenschein.com Counsel for Trinity Health Corp.
Shari Ross Lahlou CROWELL & MORING LLP 1001 Pennsylvania Avenue, NW Washington, DC 20004-2595 slahlou@crowell.com , Counsel for Bon Secours Cottage Health Services	Michael R. Shumaker JONES DAY 51 Louisiana Avenue, N.W. Washington, D.C. 20001-2113 mrshumaker@jonesday.com , Counsel for St. John Health Partners

Sheldon H. Klein BUTZEL LONG 150 W. Jefferson, Suite 100 Detroit, MI 48226-4430 klein@butzel.com Counsel for William Beaumont Hospital	
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/s/ Charles N. Raimi
DETROIT MEDICAL CENTER,
LEGAL AFFAIRS
4707 St. Antoine
Suite W514
Detroit, MI 48201
(313) 966-2226
craimi@dmc.org

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